

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

2000 MAY 25 A 9 47

In Re:

Monterra Development Corporation,  
Debtor-in-possession

Case No. 99-21577  
Chapter 11  
Reorganization

Monterra Development Corporation,  
Plaintiff,

Vs.

A.P. No. 00-0077

Ted Hale  
Defendant,

Answer

Now comes the Defendant and states the following:

First Defense

The plaintiffs complaint fails to state a claim upon which relief can be  
Granted.

Second Defense

The Defendant Admits the allegations in paragraphs 1 and 2.

The Defendant denies the allegations in paragraphs 3, 4, and 5, and  
demands strict proof thereof.

Third Defense

The defendant asserts all affirmative defenses available pursuant to the  
United States Bankruptcy Code.

Fourth Defense

The defendant asserts that the Plaintiff is in breach of contract with the

SCANNED

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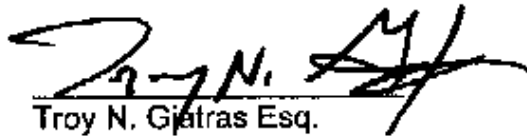
Defendant, and that the items that exist on the Plaintiffs property must satisfy the Plaintiffs debt to the Defendant.

Fifth Defense

The Plaintiff failed to timely file for such items.

**Wherefore**, the Defendant prays that this Court dismiss Plaintiffs complaint, and for such other and further relief as this Court deems appropriate and just.

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Ted Hale  
By Counsel



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